

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Gulfport Energy
Boy Scout Well Site
79900 Adams Road
Tippecanoe, Ohio 44699

ATTENTION:

Judson Shreves
Ohio Production & Completions Manager
Gulfport Energy Corporation

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Gulfport Energy (Gulfport or you) to submit certain information about the Boy Scout Well Site facility at 79900 Adams Road, Tippecanoe, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Gulfport owns and operates an emission source at the Boy Scout Well Site facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and applicable Clean Air Act regulations.

Gulfport must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Gulfport must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

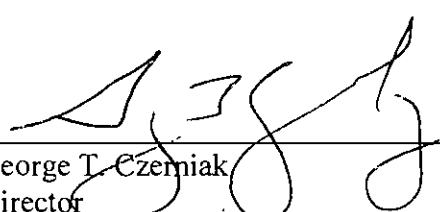
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Gulfport to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Michelle Heger at 312-886-4510.

Date

10/23/13


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, identify any source that either possesses or is likely to possess the documents or information, and provide the source's contact information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in

image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or 40 C.F.R. Part 60, Subparts A, Kb and KKK.

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. "Flare" is broadly defined as any open combustion unit (i.e., lacking an enclosed combustion chamber) whose combustion air is provided by uncontrolled ambient air around the flame, and that is used as a control or safety device. A flare may be equipped with a radiant heat shield (with or without a refractory lining), but is not

equipped with a flame air control damping system to control the air/fuel mixture. In addition, a flare may also use auxiliary fuel. The combustion flame may be elevated or at ground level.

4. The term “condensate” shall mean hydrocarbon liquid separated from natural gas that condenses due to changes in the temperature, pressure, or both, and remains liquid at standard conditions.
5. The term “condensate storage tank” shall mean the atmospheric storage tank(s) located at the site(s) that store hydrocarbon liquids (regardless of API gravity).
6. The term “control device” or its plural shall mean the air pollution control equipment used to achieve VOC emission reductions (e.g., enclosed flare, combustor, combustion device, vapor recovery unit, etc.).
7. The term “flash emissions” shall mean entrained natural gas vapors or other emissions that are released from hydrocarbon liquids when exposed to pressure drops, such as when condensate is transferred from production vessels to other vessels or to atmospheric storage tanks.
8. The term “site” or its plural shall mean the property, operations or facilities presently owned or operated by Gulfport and located in the location listed above in the request letter (79900 Adams Road, Tippecanoe, Ohio).
9. The term “tank vapor capture system” or its plural shall include all vent lines, connections, fittings, valves, relief valves, thief hatches or any other appurtenance employed to contain and collect condensate storage tank vapors and transport or convey them to the emission control device.
10. The term “working, breathing, standing (w/b/s) emissions” shall mean those emissions that can occur as vapors are displaced from the condensate storage tank headspace when the tank is filled (working) or when there are temperature or pressure fluctuations in the condensate storage tank that volatilize lighter ends (breathing/standing).

Appendix B

Information You Are Required to Submit to EPA

Gulfport Energy must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 calendar days regarding its facility located at 79900 Adams Road, Tiptecanoe, Ohio.

1. Identify the facility's current and previous owners and/or operators.
2. Provide an up-to-date plot plan of the facility.
3. Provide engineering process flow diagram(s) (PFDs) of the site. The PFDs shall include any closed vent system(s) and emission control device(s) and identify the location and settings of each pressure relief valve and each thief hatch installed on each condensate storage tank and connecting vent system(s).
4. A detailed description of the operations, including the following:
 - a. source(s) of field gas (formation, well name(s), well and/or pipeline location(s));
 - b. the composition of the field gas (in percent (%) of each species) and how the composition was determined;
 - c. step-by-step description of the gas and liquid flows;
 - d. average amount of field gas processed daily, in standard cubic feet per day (scfd), indicating the time period over which the average was calculated;
 - e. design capacity of field gas processing, in scfd;
 - f. daily average generation of each natural gas liquid (NGL), in barrels, indicating the time period over which the average was calculated; and
 - g. daily average amount of natural gas put into a pipeline, in scfd, indicating the time period over which the average was calculated.
5. Supporting materials and correspondence with any federal and/or state permitting authority regarding the approval or disapproval of applications, registrations, notifications, authorizations, determinations, or permits.
6. All information, analyses, calculations, and correspondence utilized in concluding that a permit, registration, notification, authorization, and/or determination was or was not required under the Clean Air Act.
7. Provide an electronic Excel workbook with the complete, facility-wide potential to emit calculations. Include in the response a written description of how each column in the Excel workbook is generated. Include emission factors provided by the unit manufacturer, estimates generated by process simulator software, and direct measurements. Clearly indicate the source of any emission factors used in these calculations (i.e. manufacturer, AP-42, etc.) If manufacturer-given factor, provide the document or documents which indicate, describe, or note the proper use of the factor. Provide copies of all documents and writings that refer, pertain, or relate to, or

reference an emission factor for volatile organic compounds (VOCs) from condensate storage tanks (in any unit of measure, including, but not limited to, pounds of VOCs per barrel of condensate produced).

8. Provide the estimated working, breathing, and flash emissions (in tons per year) from each of the site's current condensate storage tanks using E&P Tanks Software, V 2.0 or later version. The software inputs shall be based on analyses of representative pressurized liquid and gas samples from the separator, not the Geographical Database of sampled sites. Provide copies of the input data, all documents and writings relied upon for the input data, and the generated model output data (including a complete printout of the full report).
9. Provide monthly data for actual condensate throughput (in barrels) from January 1, 2008 (or from the first date of operation if the site was not yet operational) through the date of this request for each tank at the site that did or does receive and store condensate.
10. Identify all locations at the site where VOCs vent to the atmosphere prior to an emission control device.
11. For each VOC control device and tank vapor capture system at the site, identify:
 - a. type,
 - b. make,
 - c. model,
 - d. serial number,
 - e. rated control efficiency,
 - f. rated vent gas throughput capacity,
 - g. date of installation,
 - h. date operation commenced, and
 - i. the peak flow rates of both flash gases and total gases to each control device.
12. Identify the dates of installation and describe all existing or planned installations of buffer tanks, vapor recovery towers, tank vapor capture systems, or other units/equipment designed to minimize flash emissions or the potential for over-pressurizing the site's condensate storage tanks.
13. Provide copies of any and all correspondence with Ohio Environmental Protection Agency (OEPA) and EPA including deviation, malfunction, or abnormal condition reports or notifications, quarterly and semiannual reports, Notices of Violation received from the OEPA or local environmental agency, and corrective action plans submitted to the OEPA from July 2002 to the present. Include any record or notification submitted to the OEPA of emissions unit operation when any air emission control device was not in service.
14. For each glycol dehydration unit:

- a. Provide any and all potential to emit emission calculations from the regenerator still vent column and the flash tank;
 - b. Provide the maximum inlet gas flow rate (capacity rate) in million standard cubic feet per day (mmscf/day);
 - c. Provide the number of glycol pumps with the make, model and maximum flow rate capacity (gallons/minute) for each pump;
 - d. Extended gas analysis with a description and diagram of where the sample(s) were obtained; and
 - e. Identify and describe the emission control device or control devices associated with each unit.
15. Provide a copy of all notices and reports submitted to EPA and OEPA pursuant to the National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production, Subpart HH ("MACT HH").
16. Provide full copies of all performance tests from start-up to present. Include all test runs, even if a full test series was not completed. In the response, clearly identify the emissions unit, specify the date of the test and test method(s) used. Performance testing includes, but is not limited to, emission testing; compliance testing or monitoring; engineering testing; testing for general information; capture efficiency studies or tests; and any test, analysis, or determination of destruction efficiency. Provide a copy of any report that resulted from the test that meets the above criteria. Indicate whether such report was shared with the local and/or state permitting agency. A copy of the summary pages from each report is not sufficient; provide copies of the entire report. Provide all calculations relative to the test, and provide copies of the full test report, including the section describing the process parameters and production or processing rates at the time of the test. Also, provide copies of any reports of visible emission observations conducted during each test. For each test during which the source was not operating at maximum design capacity, provide an explanation why production was limited.
17. Provide dates of process unit shut downs, including the units affected, length of time, and events where air pollution control devices were bypassed from January 1, 2008 to the present. Indicate for each of the shut down events whether field gas continued to flow through the facility in any way and which units continued to have flow-through of field gas. Provide a detailed narrative description identifying any and all bypass practices including frequency, reason, length of time, etc. (i.e. bypass during start-up, shut-down, and/or malfunction) of any control device.
18. During EPA's inspection on July 31, 2013 of Gulfport's Boy Scout Well Site facility, EPA's FLIR™ infrared camera identified hydrocarbon emissions from an open vent hose and tank header. Describe any actions taken by Gulfport personnel or contractors subsequent to the July 31, 2013 inspection to address the fugitive or uncaptured hydrocarbon emissions. In your description(s), identify the specific piece of equipment where an action took place, describe the action(s) that took place, how your action impacts potential fugitive emissions, and the date the action(s) took place.

19. Provide a copy of all design specifications, diagrams, manufacturer recommendations and operation and maintenance manuals for the flare and any other control device at the facility.
20. State with specificity which, if any, federal and/or state regulations you believe regulate/apply to each flare, including any and all documents that include determinations, engineering assessments, and/or associated explanations made regarding applicability to each flare.
21. Identify and describe the device used to monitor the presence of each flare's pilot flame. Include a description of how it identifies the presence of the pilot flame, including calibration instructions. Provide the monitoring data from this device for each day during the period of July 1, 2007 through July 1, 2012.
22. Provide the following analytical results for each tank battery location. Submit via pdf file, noting the filename in the workbook (worksheet: ResponseToQuestions)
 - a. An extended hydrocarbon liquid analysis of a pressurized oil sample from the pressurized vessel immediately upstream of the condensate storage tank(s). Follow the sampling protocol found in Appendix C of the API E&P TANK Version 2.0 User's Manual. If such samples and analyses have been done within the past 12 months, you may provide this data. Include a copy of the lab analysis report showing:
 - i. Date and time of sample collection;
 - ii. Name of tank battery location;
 - iii. Description of where, within the tank battery location process, the sample was collected;
 - iv. Operating temperature (°F) and pressure (psi) of the vessel at the time the sample was collected;
 - v. The pressure (psi) of the sample at the time it was received in the laboratory.
 - b. At least 15 days prior to sampling, please provide a sampling protocol and schedule of sampling locations to the Compliance Tracker listed on page two of this Request to Provide Information.
 - c. API Gravity and Reid Vapor Pressure (RVP) (psia) of the "sales oil" in the condensate storage tank(s).

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

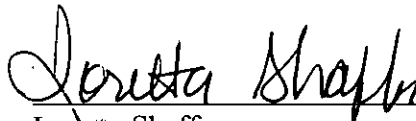
I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Judson Shreves
Ohio Production & Completions Manager
Gulfport Energy Corporation 156 Woodrow Ave.
St. Clairesville, Ohio 43950

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First-Class Mail to:

Dean Ponchak, Manager
Air Pollution Group
Southeast District Office
Ohio Environmental Protection Agency
2195 Front Street
Logan, Ohio 43138

On the 24 day of October 2013.



Loretta Shaffer
Administrative Program Assistant
AECAB, Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7672 9741